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12 Attorney for Jaime Adalberto Espinosa-Ramos

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JAIME ADALBERTO ESPINOSA-RAMOS,

19 Defendant.

20 Case No. 2:24-mj-00306-BNW

21 **STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Third Request)

22 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
23 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for
24 the United States of America, and Rene L. Valladares, Federal Public Defender, and
25 Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Jaime Adalberto Espinosa-
26 Ramos, that the Preliminary Hearing currently scheduled on April 29, 2024, be vacated and
continued to a date and time convenient to the Court, but no sooner than twenty one (21) days.

27 This Stipulation is entered into for the following reasons:

28 1. Defense counsel again checked the docket in District of Utah, and it appears
29 that Mr. Espinosa-Ramos still has not made his initial appearance in the District of Utah.

1 Counsel has no way to communicate with Mr. Espinosa-Ramos to obtain his permission to
2 file a waiver of the preliminary hearing.

3 2. A continuance is needed to allow time for counsel to speak with Mr. Espinosa-
4 Ramos and obtain his permission to file a waiver.

5 4. Defendant is incarcerated and does not object to a continuance.

6 5. Additionally, denial of this request for continuance could result in a
7 miscarriage of justice.

8 This is the third request for continuance filed herein.

9 DATED this 24th day of April, 2024.

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11 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

13 By /s/ Heidi A. Ojeda
14 HEIDI A. OJEDA
15 Assistant Federal Public Defender

By /s/ Daniel J. Cowhig
DANIEL J. COWHIG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

JAIME ADALBERTO ESPINOSA-RAMOS,

Defendant.

Case No. 2:24-mj-00306-BNW

ORDER

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on April 29, 2024 at the hour of 1:00 p.m., be vacated and continued to 5/21/2024 at the hour of 11:00 a.m.

DATED this 26 day of April, 2024.

Barlowecky
UNITED STATES MAGISTRATE JUDGE